
MONTE WELCH, Derivatively on Behalf of
SAIC, INC.,

Plaintiff,

vs.

WALTER P. HAVENSTEIN, A. THOMAS
YOUNG, FRANCE A. CORDOVA, JERE
A. DRUMMOND, THOMAS F. FRIST,
JOHN J. HAMRE, MIRIAM E. JOHN,
ANITA K. JONES, JOHN P. JUMPER,
HARRY M.J. KRAEMER, JR.,
LAWRENCE C. NUSSDORF, EDWARD J.
SANDERSON, JR., LOUIS A SIMPSON,
MARK W. SOPP, KENNETH C.
DAHLBERG, CARL BELL, and GERARD
DENAULT,

Defendants,

– and –

SAIC, INC.,

Nominal Party.

STEPHEN ROBACZYNSKI, Derivatively
on Behalf Of Himself and All Others
Similarly Situated,

Plaintiff,

vs.

WALTER P. HAVENSTEIN, A. THOMAS
YOUNG, FRANCE A. CORDOVA, JERE
A. DRUMMOND, THOMAS F. FRIST,
JOHN J. HAMRE, MIRIAM E. JOHN,
ANITA K. JONES, JOHN P. JUMPER,
HARRY M.J. KRAEMER, JR.,
LAWRENCE C. NUSSDORF, EDWARD J.
SANDERSON, JR., and LOUIS A
SIMPSON,

Defendants,

– and –

SAIC, INC.,

Nominal
Defendant.

Civil Action No. 1:12-CV-02437-JPO
ECF Case

Civil Action No. 1:12-CV-02772-JPO
ECF Case

<hr/>		:	
LOUISIANA MUNICIPAL POLICE		:	
EMPLOYEES' RETIREMENT SYSTEM,		:	Civil Action No. 1:12-CV-03019-JPO
Derivatively on Behalf of Itself, and All		:	ECF Case
Others Similarly Situated,		:	
		:	
	Plaintiff,	:	
		:	
vs.		:	
		:	
WALTER P. HAVENSTEIN, A. THOMAS		:	
YOUNG, FRANCE A. CORDOVA, JERE		:	
A. DRUMMOND, THOMAS F. FRIST,		:	
JOHN J. HAMRE, MIRIAM E. JOHN,		:	
ANITA K. JONES, JOHN P. JUMPER,		:	
HARRY M.J. KRAEMER, JR.,		:	
LAWRENCE C. NUSSDORF, EDWARD J.		:	
SANDERSON, JR., and LOUIS A		:	
SIMPSON,		:	
		:	
	Defendants,	:	
		:	
- and -		:	
		:	
SAIC, INC.,		:	
		:	
	Nominal Defendant.	:	
<hr/>		:	

**DECLARATION OF EX KANO S. SAMS II IN SUPPORT OF PLAINTIFFS
MONTE WELCH AND EDWARD STELLINI'S MOTION TO CONSOLIDATE
ACTIONS, APPOINT CO-LEAD PLAINTIFFS, CREATE AN EXECUTIVE
COMMITTEE, AND APPOINT CO-CHAIRS OF THE EXECUTIVE COMMITTEE**

I, Ex Kano S. Sams II, declare as follows:

1. I am an attorney duly licensed to practice law before all courts in the State of California and I am one of the counsel for Edward Stellini ("Stellini"). The matters stated within this declaration are based upon my personal knowledge and, if called upon, I could and would competently testify to them.

2. After the above-captioned complaints were filed, counsel for plaintiff Stellini contacted counsel for plaintiffs in the actions to discuss their orderly consolidation and leadership structure.

3. Mr. Stellini demonstrated his initiative to hold defendants accountable for the conduct alleged by directing counsel to file the first derivative complaint on behalf of SAIC to my knowledge related to the issues alleged.

4. To my knowledge, Mr. Stellini holds 54,936 shares of SAIC stock through his own holdings and those held on behalf of his wife.

5. Attached as Exhibit 1 is a true and correct copy of the Firm Resume for The Weiser Firm.

6. Attached as Exhibit 2 is a true and correct copy of the Firm Resume for Glancy Binkow & Goldberg LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this, the 15th day of May, 2012, in Los Angeles, California.


Ex Kano S. Sams II

**PROOF OF SERVICE BY ELECTRONIC POSTING
PURSUANT TO SOUTHERN DISTRICT OF NEW YORK
ECF AND LOCAL RULES AND BY MAIL
ON ALL KNOWN NON-REGISTERED PARTIES**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 1925 Century Park East, Suite 2100, Los Angeles, California 90067.

On May 15, 2012, I caused to be served the following document:

**DECLARATION OF EX KANO S. SAMS II IN SUPPORT OF PLAINTIFFS MONTE
WELCH AND EDWARD STELLINI'S MOTION TO CONSOLIDATE ACTIONS,
APPOINT CO-LEAD PLAINTIFFS, CREATE AN EXECUTIVE COMMITTEE, AND
APPOINT CO-CHAIRS OF THE EXECUTIVE COMMITTEE**

By posting such document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the attached Court's Service List.

And by **U.S. Mail** to all known non-ECF registered parties: By placing true and correct copies thereof in individual sealed envelopes, with postage thereon fully prepaid, which I deposited with my employer for collection and mailing by the United States Postal Service. I am readily familiar with my employer's practice for the collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, this correspondence would be deposited by my employer with the United States Postal Service that same day.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 15, 2012, at Los Angeles, California.

s/ Elizabeth M. Gonsiorowski
Elizabeth M. Gonsiorowski

Mailing Information for a Case 1:12-cv-02437-JPO**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Jeffrey J. Ciarlanto**
jjc@weiserlawfirm.com
- **Lionel Z. Glancy**
lglancy@glancylaw.com,dmacdiarmid@glancylaw.com,nmgoldberg@glancylaw.com,csadler@glancylaw.com,pbinkow@glancylaw.com,info@glancylaw.com,rprongay@glancylaw.co
- **Elizabeth Mary Gonsiorowski**
egonsiorowski@glancylaw.com,info@glancylaw.com
- **Robert V. Prongay**
rprongay@glancylaw.com
- **Ex Kanos S Sams , II**
esams@glancylaw.com
- **Brett D Stecker**
bds@weiserlawfirm.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

David M. Promisloff
Kessler Topaz Meltzer & Check, LLP
280 King of Prussia Road
Radnor, PA 19087

Robert Weiser
The Weisler Law Firm
121 N. Wayne Avenue
Suite 100
Wayne, PA 19087

SERVICE LIST VIA U.S. MAIL

Gabriel Herrmann
Gibson, Dunn & Crutcher LLP
200 Park Avenue
New York, NY 10166-0193
GHerrmann@gibsondunn.com

Jason J. Mendro
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
JMendro@gibsondunn.com

Kristopher P. Diulio
Gibson, Dunn & Crutcher LLP
3161 Michelson Drive
Irvine, CA 92612-4412

For Defendant SAIC, Inc.

Neil Eggleston
Robert Gilmore
Beth Williams
Kirkland & Ellis LLP
655 Fifteenth Street, N.W
Washington, D.C. 20005-5793
neil.eggleston@kirkland.com
robert.gilmore@kirkland.com
beth.williams@kirkland.com

*For Defendants Walter P. Havenstein, A.
Thomas Young, France A. Córdova, Jere A.
Drummond, Thomas F. Frist, John J.
Hamre, Miriam E. John, Anita K. Jones,
John P. Jumper, Harry M.j. Kraemer, Jr.,
Lawrence C. Nussdorf, Edward J.
Sanderson, Jr., and Louis A. Simpson*